

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
)	
v.)	Case No. 1:19-CR-10081-IT
)	
)	
NIKI WILLIAMS &)	
GORDON ERNST, <i>et al.</i> ,)	
)	
Defendants.)	

**DEFENDANT NIKI WILLIAMS' REVISED
MOTION TO DISMISS INDICTMENT**

Defendant Niki Williams (“Williams”) hereby moves the Court to dismiss the Superseding Indictment [Dkt. No. 272] pursuant to Rule 12(b)(3)(B) of the Federal Rules of Criminal Procedure. As set forth in the attached memorandum, the Court should dismiss the Indictment because it fails to state a criminal offense against Williams. Williams also joins her co-defendant, Donna Heinel’s, motion to dismiss for the reasons raised in her brief.

Respectfully Submitted,
NIKI WILLIAMS
By her attorney,

Dated: December 17, 2019

/s/ Eric Tennen
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CERTIFICATE OF COMPLIANCE WITH RULE 7.1

Undersigned counsel conferred with the government regarding this motion and the government indicated it will oppose it.

/s/ Eric Tennen
Eric Tennen

CERTIFICATE OF SERVICE

I, Eric Tennen, hereby certify that on December 17, 2019, this document, filed through the CM/ECF system, will be sent electronically to all registered participants in this matter as identified on the Notice of Electronic Filing (NEF).

/s/ Eric Tennen
Eric Tennen